UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MISSOURI CENTRAL DIVISION

Parents, Families, and Friends of Lesbians)	
and Gays, Inc., et al.,)	
Plaintiffs,)	
)	
V.)	No. 2:11-cv-04212-NKL
)	
Camdenton R-III School District; et al.,)	
)	
Defendants.)	

MOTION FOR APPOINTMENT OF NEXT FRIEND

Comes Plaintiff Jane Doe, by her next friend and father, John Doe, pursuant to Rule 17(c) of the Federal Rules of Civil Procedure, and moves the Court to appoint John Doe as next friend of Jane Doe for purposes of instituting and prosecuting the above action, based upon the following grounds:

- 1. John Doe is the father of Jane Doe, a minor under the age of 18 on whose behalf he desires to initiate and prosecute an action for declaratory judgment, injunctive relief, and the recovery of nominal damages sustained as a result of Defendants' unconstitutional policy, custom, and practice of viewpoint discrimination.
- 2. Jane Doe has no conservator of her estate, and it is, therefore, necessary that a next friend be appointed to represent her for the purposes of instituting and prosecuting the above action.
- 3. John Doe, who is a competent and reasonable person, consents to be appointed next friend for Jane Doe for purposes of instituting and prosecuting this action on her behalf and acknowledges responsibility for the costs of this action.

WHEREFORE it is respectfully requested that John Doe be appointed as next friend of Plaintiff Jane Doe for the purpose of initiating and prosecuting this case.

Respectfully Submitted,

By /s/ Anthony E. Rothert

Mark Sableman #36276 A. Elizabeth Blackwell #50270

THOMPSON COBURN LLP

One U.S. Bank Plaza St. Louis, Missouri 63101 314-552-6000 FAX 314-552-7000

msableman@thompsoncoburn.com eblackwell@thompsoncoburn.com

Anthony E. Rothert, # 44827 Grant R. Doty, # 60788 American Civil Liberties Union of Eastern Missouri

> 454 Whittier Street St. Louis, Missouri 63108 314-652-3114 FAX 314-652-3112

> > tony@aclu-em.org grant@aclu-em.org

Joshua A. Block
James Esseks
LGBT Project
ACLU Foundation
125 Broad Street, Floor 18
New York, New York 10004
(212) 549-2600
FAX 212-549-2650

jblock@aclu.org jesseks@aclu.org

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Thomas A. Mickes Betsey A. Helfrich MICKES GOLDMAN O'TOOLE, LLC 555 Maryville University Drive Suite 240 St. Louis, Missouri 63141

Attorneys for Defendants Camdenton R-III School District and Timothy E. Hadfield

/s/ Anthony E. Rothert